



**DECLARATION OF LAUREN GALLO WHITE**

I, Lauren Gallo White, declare as follows pursuant to 28 U.S.C. § 1746:

1. I am a partner at Wilson Sonsini Goodrich & Rosati, P.C., counsel to Defendant Google LLC, erroneously sued as Google Inc. (“Google”). Pursuant to Civil Local Rule 6-2, I submit this declaration in support of the parties’ Joint Stipulation to Stay Discovery and Continue Other Dates (the “Stipulation”). I have personal knowledge of the facts set forth in this declaration, and I could and would testify competently thereto if called upon to do so.

2. As explained in the Stipulation, Google has filed a motion to dismiss Plaintiffs’ complaint in its entirety, obviating the need for discovery or any other proceedings in this case.

3. The parties have agreed: (a) to stay all discovery (including, but not limited to, disclosures under Rule 26) for 120 days as of the filing of the Stipulation, with an option to extend by mutual agreement; (b) to continue the case management conference—currently scheduled for May 20, 2021 at 11:00 a.m.—to 30 days after the Court rules on Google’s motion to dismiss, or such other date established by the Court; (c) to continue the deadline for the case management statement to 7 days prior to the postponed initial case management conference, or such other date established by the Court; and (d) to extend the deadline for Plaintiffs’ opposition to Google’s Motion to Dismiss to June 7, 2021 and to extend the deadline for Google’s reply to Plaintiffs’ opposition to July 14, 2021. The parties acknowledge that the stay will also extend the deadline for the ADR certification and other steps in the mandatory ADR process.

4. Google maintains that, given the significant legal questions raised by Plaintiffs’ theory of liability, the Court should stay discovery until the resolution of its motion to dismiss or until the scope of the claims is otherwise resolved.

5. On April 16, 2021, I was included on an email to Plaintiffs’ counsel, Keith Altman, stating Google’s position and asking Plaintiffs to agree to: “Staying discovery, including Rule 26 disclosures, for 120 days from the date of the stipulation; [c]ontinuing the initial case management conference to 30 days after the Court rules on Google’s upcoming motion to dismiss; [c]ontinuing the deadline for the case management statement to 7 days prior to the postponed initial case management conference; [and] reserving the parties’ right to move for a

1 longer stay if needed.” On April 16, 2021, Plaintiffs’ counsel agreed to so stipulate, responding,  
2 “I am fine with that.”

3 6. On April 23, 2021, I was included on an email in which Plaintiffs’ counsel wrote:  
4 “All, Given the extended time for the hearing, would Defendants agree to a 30 day extension for  
5 both the MTD and the reply?” On Apr 26, 2021, Google agreed to so stipulate.

6 I declare under penalty of perjury under the laws of the United States that the foregoing is  
7 true and correct. Executed April 26, 2021 at San Francisco, California.

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9 By: /s/ Lauren Gallo White

Lauren Gallo White

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11 *Attorneys for Defendant* GOOGLE LLC  
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